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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

PETER DELVECCHIA, *et al.*,

Plaintiffs,

vs.

FRONTIER AIRLINES, INC., *et al.*,
Defendants.

Case No: 2:19-CV-01322-KJD-DJA

**PLAINTIFFS' MOTION FOR LEAVE
TO FILE EXHIBIT A TO MOTION FOR
SANCTIONS UNDER SEAL**

LR IA 10-5

Plaintiffs, Peter DelVecchia individually and as next friend of A. D., a minor, by counsel, hereby move pursuant to Local Rule IA 10-5(a) for leave to file Exhibit A to its Motion for Sanctions (ECF No. 128), consisting of certain redacted Frontier incident reports of suspected human trafficking and/or sex trafficking, and complaints by other Frontier passengers of racial discrimination, under seal. The sole reason for Plaintiffs seeking leave to file the documents under seal is that Frontier produced them stamped "**CONFIDENTIAL SUBJECT TO PROTECTIVE**

PLAINTIFFS' SECOND MOTION PURSUANT TO LR IA 10-5

1 **ORDER**” indicating designation under the Protective Order entered in this action on October 10,
2 2019 (ECF No. 37). That Order does not specifically authorize the filing of any document under seal.
3 Plaintiffs do not believe that the documents contain “confidential information” worthy of protection
4 under that Order, and hereby give notice of their position to Defendants pursuant to Paragraph 3 of
5 that Order. For the present time, however, this Motion is filed pursuant to LR IA 10-5.
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7 DATED this 20th day of August, 2021.

8 /s/ John D. McKay

9 John D. McKay (admitted *pro hac vice*)
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22 *And A.D., a Minor*
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